



# FCC Meetings

VRS Reform Policy Recommendations

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**For more information:**

John Goodman

Chief Legal Officer

[john.goodman@purple.us](mailto:john.goodman@purple.us)

# Purple Profile

**2<sup>nd</sup> largest provider of relay services**

**Service portfolio includes text, video, and captioning relay**

**Company's sole focus is serving deaf and hard of hearing**

**Headquarters in Rocklin, California**

**~1,350 employees and contractors**

# Purple's VRS Reform Positions

*Dockets 10-51 and 03-123*

- **Technical standards should be established**
  - Benefits include address book portability which today, is a deterrent to switching.
- **Centralized registration and verification system operated by a 3<sup>rd</sup> party**
- **Phased elimination of small provider subsidy**
  - Purple has proposed a specific modified tier structure using per minute compensation, but only for a finite duration to allow smaller providers to climb the scale curve prior to being paid at the same rate as larger providers.
  - Purple's modified tier structure proposal would yield at least a \$50 million annual savings to the TRS fund when implemented
- **Adoption of a long term reimbursement model that:**
  - Does not unfairly advantage Sorenson in its ability to lock-in customers
  - Prevents discrimination against consumers and is developed with consumer input
  - Is commonly applied to all providers
  - Is based on price caps

Purple's Comments: <http://apps.fcc.gov/ecfs/document/view?id=7021899196>

# Objection to Protective Order

- **Sorenson's outside legal counsel (Wiltshire) has made Acknowledgements of Confidentiality filings under the FCC's Protective Order related to VRS reform**
- **Sorenson's counsel should not be entitled to access VRS provider Confidential or Highly Confidential information under the cloak of the FCC's Protective Order**
- **Sorenson's counsel appears to fail any test of independence**
  - Multiple instances of Sorenson's counsel being involved in strategic direction setting as outlined in Purple's letter to the FCC and well cited on Docket 10-51.

Purple's Letter of Objection to FCC: <http://apps.fcc.gov/ecfs/document/view?id=7021979103>